BEFORE THE POSTAL RATE COMMISSION WASHINGTON, D.C. 20268-0001

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POSTAL RATE AND FEE CHANGES, 2000

Docket No. R2000-43 PH '00

VAL-PAK DIRECT MARKETING SYSTEMS, INC.,
VAL-PAK DEALERS' ASSOCIATION, INC., AND
CAROL WRIGHT PROMOTIONS, INC.
FIRST INTERROGATORIES AND REQUESTS FOR
PRODUCTION OF DOCUMENTS TO UNITED STATES POSTAL SERVICE
WITNESS CHARLES L. CRUM (VP-CW/USPS-T27-1)
(March 15, 2000)

Pursuant to sections 25 and 26 of the Postal Rate Commission rules of practice, Val-Pak Direct Marketing Systems, Inc., Val-Pak Dealers' Association, Inc., and Carol Wright Promotions, Inc. hereby submit interrogatories and document production requests. If necessary, please redirect any interrogatory and/or request to a more appropriate Postal Service witness.

Respectfully submitted,

William J. Olson

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Counsel for:

Val-Pak Direct Marketing Systems, Inc., Val-Pak Dealers' Association, Inc., and

Carol Wright Promotions, Inc.

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with Section 12 of the Rules of Practice.

John'S Miles

March 15, 2000

VP-CW/USPS-T27-1.

Please refer to your response to PSA/USPS-T27-5(a), where you assert that "Also, [all] ECR parcels require a detached label card."

- a. Please cite section(s) of the DMM on which you rely for your above-quoted statement.
- b. Please refer to DMM Section A060, Detached Address Labels ("DALs"), subsection 1.3, Standard Mail (A) Merchandise Samples, and confirm that this section of the DMM does not require that all ECR parcels require a DAL. If you do not confirm, please explain fully.